

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

*Plaintiff,*

v.

DONALD J. TRUMP, in his personal capacity,

*Defendant.*

Civil Action No.: 1:20-cv-7311-LAK-JLC

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that the defendant, President Donald J. Trump, hereby moves this Court, before the Hon. Lewis A. Kaplan, United States District Judge for the Southern District of New York, located at 500 Pearl Street, New York, NY 10007, on a date to be set by the Court, for entry of an order granting a new trial and/or altering or amending the judgment, pursuant to Rule 59 of the Federal Rules of Civil Procedure, and for such other relief that the Court may deem just and proper.

This motion is supported by the annexed memorandum of law, any arguments or evidence presented in reply, all arguments or evidence presented at a hearing or with leave of Court, and upon all prior proceedings, pleadings, and filings in this action.

/s/ Alina Habba

Alina Habba, Esq.

Michael T. Madaio, Esq.

HABBA MADAIO & ASSOCIATES LLP

1430 U.S. Highway 206, Suite 240

Bedminster, New Jersey 07921

-and-

112 West 34th Street, 17th & 18th Floors

New York, New York 10120

Telephone: (908) 869-1188

E-mail: ahabba@habbalaw.com

/s/ D. John Sauer

D. John Sauer\*

William O. Scharf\*\*

JAMES OTIS LAW GROUP, LLC

13321 North Outer Forty Road, Suite 300

Chesterfield, Missouri 63017

(314) 562-0031

John.Sauer@james-otis.com

\* *Pro Hac Vice* pending

\*\* *Pro Hac Vice* forthcoming

Dated: New York, New York

March 5, 2024

*Attorneys for President Donald J. Trump*